

SDMS US EPA Region V

Imagery Insert Form

Document ID:

170520

Some images in this document may be illegible or unavailable in SDMS. Please see reason(s) indicated below:

☒ X

Illegible due to bad source documents. Image(s) in SDMS is equivalent to hard copy.

Specify Type of Document(s) / Comments:

EJ ANALYSIS MAP

☒ X

Includes X COLOR or X RESOLUTION variations.

Unless otherwise noted, these pages are available in monochrome. The source document page(s) is more legible than the images. The original document is available for viewing at the Superfund Records Center.

Specify Type of Document(s) / Comments:

EJ ANALYSIS MAP

☐ Confidential Business Information (CBI).

This document contains highly sensitive information. Due to confidentiality, materials with such information are not available in SDMS. You may contact the EPA Superfund Records Manager if you wish to view this document.

Specify Type of Document(s) / Comments:

☐ Unscannable Material:

Oversized or Format.

Due to certain scanning equipment capability limitations, the document page(s) is not available in SDMS. The original document is available for viewing at the Superfund Records center.

Specify Type of Document(s) / Comments:

☐ Document is available at the Records Center .

Specify Type of Document(s) / Comments:



170520
0000000

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

MEMORANDUM

SUBJECT: ACTION MEMORANDUM - Request to Conduct a Time-Critical Removal Action at the Itasco, also known as the IWI Inc. Site, Summit, Cook County, Illinois.

FROM: *Kenneth B. Rhame*
Kenneth B. Rhame, On-Scene Coordinator
Emergency Response Branch - Section 3

TO: William E. Muno, Director
Superfund Division

THRU: Richard Karl, Chief *R. Karl*
Emergency Response Branch

I. PURPOSE

The purpose of this memorandum is to request and document your approval to expend up to \$660,000 in order to mitigate threats to public health, welfare, and the environment at the IWI Inc. Site located in Summit, Cook County, Illinois. The response action is necessary to address the release and the threat of future releases of various abandoned hazardous materials, including solutions that are highly flammable. Analyses for hazardous waste characteristics were performed on the material collected from 12 containers. The results indicate that the material contained in 11 of the 12 containers, exhibits the characteristic of a hazardous waste due to ignitability. The material in the 11 of the 12 containers had a flashpoint below the regulatory level of 140 degrees Fahrenheit (°F). Also 4 of the 12 containers failed the paint filter test, which indicates that they contained free liquid. In addition, many of the containers sampled had elevated concentrations of metals (antimony, chromium, and lead) and TCLP metals (chromium up to 42.4 mg/L and lead from 7.18 mg/L to 281 mg/L). These containers as well as buildings in which these containers are stored have been left on site by a deceased owner/operator. Proper packaging and off-site disposal of these hazardous materials will alleviate further impacts to the environment and surrounding

The response actions to the release and potential release of hazardous materials will be conducted in accordance with Section 104(a)(1) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 USC § 9604(a)(1) to abate the further release into the environment. Presence of flammable liquids, sludges, and unknowns in above ground storage tanks (ASTs), drums, chemical totes, and open containers, some of which have leaked, makes this a time-critical removal action.

There are no nationally significant or precedent setting issues associated with the IWI, Inc., site. This site is not on the National Priorities List.

II. **SITE CONDITIONS AND BACKGROUND**

CERCLIS ID# ILD 097 179 204

The IWI, Inc., site is located at 7738 West 61st Place in Summit, Cook County, Illinois. The geographic coordinates of the site are 41°46'47" north latitude and 87°48'51" west longitude. The site is approximately 1.7 acres and consists of three main buildings within the sites boundaries. The largest building is approximately 45,000 square feet and has several floors, the stack building is approximately 5,000 square feet, the building known as building three is approximately 1,000 square feet. The site is located in a mixed area of both industrial and residential. A residential development is located directly south of the site.

According to the Village of Summit Building Code Enforcement Officer, Mr. Jeffrey Duley, IWI, Inc., was owned and operated by Mr. Glenn Wellman. Operations at the site included chemical tote manufacturing and chemical tote, drum, and pail reconditioning and processing. The original source(s) of the on-site containers is unknown. According to Mr. Duley, operations at the site ceased in 1996, and Mr. Wellman has since passed away.

According to records, two fires have occurred at this facility, the first fire in August 1985 that Illinois Environmental Protections Agency (IEPA) responded to and again in May 2002 that US EPA responded to.

On May 16, 2002, Bruce Everetts, Supervisor, Illinois EPA, Bureau of Land, Division of Remediation Management referred the Site to the United States Environmental Protection Agency (U.S. EPA). In his referral, he wrote, "This is an abandoned, uncontrolled site that poses a threat to the environment and trespassers. A fire on Monday, May 13, 2002, which leaves drums exposed to the weather, underlines the urgency for quick action."

During a Site assessment conducted on June 24 and 25, 2002, access to the site was unrestricted. The chain-link fence bordering the site to the north had a hole cut in it that was approximately 4 feet wide. The temporary fencing located on the southern border

of the site was secured with wire ties and can be easily opened. There was evidence of trespassing including graffiti throughout the site. Furthermore, many of the site buildings were significantly damaged by the fire and were inaccessible because of severe roof and floor damage.

During the initial site reconnaissance a MultiRAE photoionization detector (PID) and a GM Pancake were used to determine if either organic or radiological contamination was present inside the site buildings. Both PID and radiological readings were zero. Floor damage on the second floor was severe enough to prevent full exploration of the second floor. Approximately 41 containers were noted on the second floor, including two fiberglass AST's (15,000 gallons each), one 500-gallon AST, one 275-AST, and 27 55-gallon drums.

Approximately 170 fifty-five gallon drums were identified during the site assessment. Many of these drums were inaccessible because they were stacked or because they were unstable due to their deteriorated condition. Many of the drums were leaking or were improperly sealed. Drums located in the drum storage area south of room five were leaking and were draining into the drainage ditch to the west. Furthermore, chemical totes and ASTs of varying capacity were also encountered on-site. The totes varied from 345 gallons to 600 gallons. The ASTs ranged in size from 275 gallons to 20,000 gallons.

In Region 5 Environmental Justice (EJ) Criteria for Illinois: the low-income percentage is 54% or greater and the minority is 50% or greater. To meet the environmental justice (EJ) criteria, the area within 1 mile of the Site must have a population that's twice the state low-income percentage and/or twice the state minority percentage. At this site, the low-income percentage is 58% and the minority percentage is 81%. Therefore, this Site does meet the region's EJ criteria based on demographics as identified in the "Region 5 Superfund EJ Analysis Itasca Site Summit, IL.

III. THREATS TO PUBLIC HEALTH, WELFARE, OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions at the IWI Summit Site present and imminent and substantial endangerment to the public health, welfare, and the environment and meet the criteria for a time-critical removal action provided for in Section 300.415 (b)(2) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), as amended, 40 CFR Part 300. These factors include, but are not limited to the following:

- i) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;

Analytical results indicate that surfaces soil has been impacted by elevated concentrations of lead and chromium. Total lead concentrations on-site were detected up to a maximum concentration of 4,240 mg/kg. In one sample, chromium was

detected at a concentration of 820 mg/kg. In addition, TCLP lead (12.7 mg/L) in site soils exceeded the criteria for toxicity. The contents of multiple containers on site were found to have flashpoints below the minimum temperature level (140°F) which would indicate that the material exhibits the characteristics of a hazardous waste for ignitability as outlined in 40 CFR, Chapter 1, Section 261. Because access to the site is unrestricted and because human activity is apparent at the site, the presence of high lead and chromium levels in site soils as well as the presence of petroleum waste and waste hazardous wastes in the containers that have been abandoned on-site, increases the likelihood that the site poses a significant threat to human health and the environment.

- ii) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release.

Some of flammable and unknown liquids are leaking from vats and tanks. The hazardous materials containers, including ASTs, totes, and drums, are scattered around the facility both inside and outside the buildings. Now that no one is taking care of the facility and the materials stored on the property, conditions are subject to deteriorate. Trespassing, scavenging, and vandalism are also worrisome factors under these circumstances.

- iii) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;

Due to the materials and containers location and with the onset of cold temperatures, many of the containers of hazardous liquids are subject to freeze and rupture, thus causing widespread contamination. Also, some of these materials are exposed to the elements and are subject to be washed off site causing discharges into surface water and soils.

- iv) Threat of fire or explosion.

Drums, chemical totes, and ASTs were observed on the IWI site. The locations and conditions of these containers varied substantially. A majority of the drums were severely damaged and degraded as they were leaking, rusting, and bulging. Most of the chemical totes appeared to be in suitable shape, but some have deteriorated. The contents of these containers are mostly unknown though many containers appeared to be empty. The possibility of fire or explosion exists if the material inside a container is highly flammable. The contents of 11 of the 12 containers sampled were found to have flashpoints below 140 °F, which exceeds the regulatory limits used to define a hazardous waste for ignitability. The flammability of the material inside the containers coupled with the possibility of a spark being generated from collapsing drums or structures presents a threat of fire or explosion. Two fires have already occurred at the site in August 1985 and in May 2002.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

The response actions described in this memorandum directly address actual or potential releases of hazardous substances on Site, which pose an imminent and substantial endangerment to public health, or welfare, or the environment. Removal activities on Site will include:

- 1) Develop and implement a Site Health and Safety and Site Security Plan;
- 2) Sample and characterize all the waste containers and contaminated soils;
- 3) Secure, package, and dispose of the containerized waste;
- 4) Take any response actions necessary to address any release or threatened release of a hazardous substance, pollutants, or contaminant that the U.S. EPA determines may pose an imminent and substantial endangerment to public health or the environment including potential impact on surface water or ground water.
- 5) Conduct post removal sampling and analysis to verify completion of the removal action;

The removal action will be conducted in a manner not inconsistent with the NCP. The OSC has initiated planning for provision of post-removal Site control consistent with the provisions of Section 300.415(1) of the NCP. Elimination of all surface threats is, however, expected to minimize the need for post-removal Site control.

It may be necessary to demolish and/or stabilize some of the buildings on site in order to conduct the removal action safely.

The removal activities are expected to take 45 on-site working days to complete.

The detailed cleanup contractor cost is presented in Attachment 1 and estimated project costs are summarized below:

REMOVAL PROJECT CEILING ESTIMATE

EXTRAMURAL COSTS:

Regional Removal Allowance Costs:

Total Cleanup Contractor Costs	\$500,000
--------------------------------	-----------

(This cost category includes estimates for: ERRS, subcontractors, Notices to Proceed, and Interagency Agreements with Other Federal Agencies. Includes 15% Contingency.)

<u>Other Extramural Costs Not Funded from the Regional Allowance:</u>	
Total START, including multiplier costs	\$50,000
Subtotal	\$50,000
Subtotal, Extramural Costs	\$550,000
Extramural Costs Contingency (20% of Subtotal, Extramural Costs)	<u>+\$110,000</u>
TOTAL, REMOVAL ACTION PROJECT CEILING	\$660,000

All hazardous substances, pollutants, or contaminants removed off Site pursuant to this removal action for treatment, storage, or disposal shall be treated, stored, or disposed of at a facility in compliance as determined by U.S. EPA Off-Site Rule, 40 CFR § 300.440.

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants, or contaminants at the Site which may pose an imminent and substantial endangerment to public health and safety and the environment. These response actions do not impose a burden on the affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

Applicable or Relevant and Appropriate Requirements

All applicable, relevant, and appropriate requirements (ARARs) of Federal and State law will be complied with to the extent practicable.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed or no action will increase the potential of the corrosive and toxic hazardous substances to release, thereby threatening the adjacent population and the environment.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this site is contained in the Enforcement Confidential Addendum.

According to the Village of Summit Building Code Enforcement Officer, Mr. Jeffrey Duley, the IWI, Inc. Site has been abandoned since 1996, and Mr. Glenn Wellman (Owner/Operator) has since passed away.

The total EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$948, 720. ¹


$$\$660,000 + \$10,000) + (41.6\% \times \$670,000) = \$948,720$$

IX RECOMMENDATION

This decision document represents the selected removal action for the IWI, Inc., Site located at 7738 West 61st Place in Summit, Cook County, Illinois. It was developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based upon the Administrative Record for the Site. Conditions at the Site meet the NCP Section 300.415(b)(2) criteria for a removal and I recommend our approval of the proposed removal action. The total project ceiling, if approved, will be \$660,000. Of this, an estimated \$500,000 comes from the regional removal allowance.

¹ Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgement interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

You may indicate your decision by signing below.

APPROVE:  DATE: 11/29/02
Director, Superfund Division

DISAPPROVE: _____ DATE: _____
Director, Superfund Division

Enforcement Addendum

Attachments

1. Detailed Cleanup Contractor Cost Estimate
2. Administrative Record Index

cc: R. Worley, U.S. EPA 5202G
M. Chezik, U.S. Department of Interior, w/o Enf. Addendum
R. Cipriano, Illinois EPA w/o Enf. Addendum
S.Davis, Illinois Dept. of Natural Resources w/o Enf. Addendum

**PAGE 9 HAS BEEN REDACTED AS IT CONTAINS A
BCC LIST NOT RELEVANT TO THE REMOVAL
ACTION.**

**THE ENFORCEMENT ADDENDUM FOR THE IWI, INC.
SITE HAS BEEN REDACTED AS IT IS NOT RELEVANT
TO THE REMOVAL ACTION.**

ATTACHMENT 1**DETAILED CLEANUP CONTRACTOR ESTIMATE****IWI, INC., SITE
SUMMIT, COOK COUNTY, ILLINOIS
OCTOBER 2002**

The estimated cleanup contractor costs necessary to complete the removal action at the IWI, Inc., Site are as follows:

Personnel	\$90,000
Equipment	\$84,000
Transportation and Disposal	\$280,000
Other Subcontractors	\$46,000
	=====
	\$500,000

**THE INDEPENDENT GOVERNMENT COST ESTIMATE
FOR THE IWI, INC. SITE HAS BEEN REDACTED AS IT
IS NOT RELEVANT TO THE REMOVAL ACTION.**

ATTACHMENT 2

U.S. ENVIRONMENTAL PROTECTION AGENCY REMOVAL ACTION

ADMINISTRATIVE RECORD FOR ITASCO (IWI INC.) SITE SUMMIT, COOK COUNTY, ILLINOIS

ORIGINAL
OCTOBER 29, 2002

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	05/16/02	Everetts, B., Illinois EPA	Nachowicz, L., U.S. EPA	Letter re: Illinois EPA's Request for U.S. EPA Assistance in Conducting a Removal Assessment at the IWI Inc. Site	1
2	10/08/02	Weston Solutions, Inc.	U.S. EPA	Site Assessment Report for the IWI Site (Revision 1)	85
3	10/17/02	U.S. EPA	File	Region 5 Superfund EJ Analysis for the Itasco Site	1
4	10/28/02	Rhame, K., U.S. EPA	Everetts, B., Illinois EPA	Letter re: U.S. EPA's Request for Illinois ARARs for the Upcoming Removal Action at the Itasco/IWI Inc. Site	2
5	00/00/00	Rhame, K., U.S. EPA	Muno, W., U.S. EPA	Action Memorandum: Request to Conduct a Time-Critical Removal Action at the Itasco (IWI Inc.) Site (PENDING)	

Region 5 Superfund EJ Analysis

Itasca Site Summit, IL

